

**IN THE UNITED STATES DISTRICT COURT
OF THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JARVON MARTEL CROSSLEY,)	
)	
Plaintiff,)	No. 19 C 8263
)	
v.)	
)	Judge Mary M. Rowland
SHERIFF THOMAS DART, et al.,)	
)	
Defendants.)	

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO CONDUCT
PLAINTIFF'S LIMITED DEPOSITION DKT. NO. 109**

NOW COMES Defendants Officer Anderson, Correctional Officer Bakowski, Sgt. Drake Carpenter, Officer Patterson, Lieutenant Rubio, Thomas Dart, by and through his attorney, KIMBERLY M. FOXX, State's Attorney of Cook County, through her assistants, Jorie R Johnson, Molly Triolo, and Marissa D. Longoria, pursuant to Fed. R. Civ. P. 6(b)(1)(A), and state as follows:

1. On November 17, 2021, The Court ordered that Plaintiff's Limited deposition regarding the Division 9 freight elevator incident be completed by December 31, 2021. (Dkt. 109.)
2. Defendants intended to take Plaintiff's deposition on December 2, 2021 and indicated such date in the joint filed on November 15, 2021. (Dkt. 108).
3. Due to unforeseen circumstances from internet connectivity outages, Plaintiff's deposition was unable to be conducted on December 2, 2021.

4. Furthermore, Counsel for Defendants have recently changed as of December 2, 2021. Defense Counsel Longoria will be withdrawing from this case and new Defense Counsel Johnson and Triolo have been substituted in her place.
5. New Counsel is unfamiliar with this case and require more time to come up to speed with the matter.
6. This motion for extension of time is not to cause delay in this case but to make sure all Defendants' rights and defenses are being fairly represented.
7. Undersigned counsel discussed this matter with counsel for Plaintiff on December 2, 2021 and the Motion is unopposed.
8. Additionally, undersigned counsel already proposed alternative dates to Plaintiff's Counsel in January to conduct the deposition.
5. Plaintiff will not be prejudiced if Defendants' Motion is granted.

WHEREFORE, Defendants, respectfully request that this Court grant the following relief:

1. Grant an extension of time until January 31, 2022 for Defendant's to conduct Plaintiff's limited deposition.

Respectfully submitted,

KIMBERLY M. FOXX
State's Attorney of Cook County

By: /s/: Jorie R. Johnson

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Counsel for Defendants

CERTIFICATE OF SERVICE

I, Jorie R. Johnson hereby certify that on December 6, 2021 I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of Illinois Eastern Division by using the CM/ECF system. I certify that in accordance with Fed. R. Civ. P. and LR 5.5 and the General Order on Electronic Case Filing (ECF).

/s/Jorie R. Johnson
Jorie R. Johnson